

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

OLIVIA Y., et al.,)	
)	
Plaintiffs,)	
)	
v.)	3:04-CV-251-HSO-FKB
)	
TATE REEVES, as Governor of the State of Mississippi, et al,)	
)	
Defendants.)	

DECLARATION OF JONATHAN BORLE

Jonathan Borle, an attorney of record in this civil action, makes this declaration under penalty of perjury and under 28 U.S.C. § 1746.

1. I am a member of the California Bar and I am admitted to practice in this Court *pro hac vice*. I am co-counsel for the Plaintiff Class in this case along with local counsel, I give this Declaration in support of Plaintiffs' Memorandum in Support of Plaintiffs' Motion for Award of Class Counsel's Fees and Expenses.

2. As demonstrated by my resume, submitted as Attachment A to this Declaration and incorporated herein, I graduated from the University of Virginia School of Law in 2016. From 2016 to 2018, and 2019 through 2021, I worked as a litigation associate (first at Jones Day, then at Sheppard, Mullin, Richter & Hampton), concentrating in civil litigation and commercial disputes. From 2018 through 2019, I served as a law clerk to United States District Judge Thomas L.



Parker. In 2021, I became a staff attorney at A Better Childhood, which brings class action lawsuits to reform dysfunctional child welfare systems.

3. I have worked on the *Olivia Y.* matter since April 2021.
4. As a staff attorney at A Better Childhood, I know that it is the consistent policy and business practice of all counsel and support staff on this case to maintain contemporaneous and specific records of all time, and for such records to be entered into an online database. As part of my daily practice, I entered my time as I worked on this case into the database, contemporaneously with the work being done. Along with Marcia Robinson Lowry and Anastasia Benedetto, I have reviewed the time database for accuracy, and attest these summaries are an accurate and reliable account of the work performed and the compensable expenses incurred by Plaintiffs' counsel and support staff in this case.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this the 25th day of January, 2023 in New York, New York.

/s/ Jonathan Borle
Jonathan Borle (*pro hac vice*)
Attorney for Plaintiffs

JONATHAN G. BORLE

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EDUCATION

University of Virginia, School of Law, Charlottesville, VA

Juris Doctor, May 2016

Honors: 1979 Thomas Tegnazian Memorial Scholar

Activities: Virginia Journal of International Law, Senior Editor

Institut d'Etudes Politiques de Paris (Sciences Po), Paris, France

Master's in Economic Law, Emphasis on Global Governance Studies, May 2016

University of California, Santa Barbara, Goleta, CA

Bachelor of Arts, Global Studies, Highest Honors (top 2.5%), June 2013

GPA: 3.93

Honors: Phi Beta Kappa

Activities: UCSB Mock Trial

Law & Society Journal, Editor-in-Chief

EXPERIENCE

A Better Childhood (Child Welfare Reform Litigation), New York, NY

Staff Attorney, April 2021—Present

- Helped re-negotiate key terms of a joint consent decree regarding with the state of Mississippi regarding improvements to its administration of foster care
- Assisted with day-to-day litigation (requesting and responding to discovery, drafting motions, conferring with counsel, attend court hearings) in states such as West Virginia and Oregon, where our organization has ongoing class action lawsuits

Sheppard, Mullin, Richter & Hampton, Los Angeles, CA

Business Trial Associate, September 2019—April 2021

- Drafted briefs for motions to dismiss, oppositions to demurrer, motions to compel, motions for protective orders, motions for reconsideration, motions for attorney's fees, reply briefs, meet and confer letters, and requests and responses to discovery; second-chaired arguments on demurrer, a motion to compel, a motion for protective order; appeared in several case management conferences
- Represented artbook publisher in appeal currently before Ninth Circuit Court of Appeals in matter involving U.S. enforcement of French copyright judgment; drafted opening brief in that appeal and developed appellate strategy

United States District Court, Western District of Tennessee, Memphis, TN

Law Clerk for Judge Thomas L. Parker, August 2018—August 2019

- Managed one-half of Judge's civil litigation docket
- Drafted orders on dozens of dispositive motions and hundreds of procedural motions; assisted Judge Parker with nine criminal and civil jury trials

Jones Day, Irvine, CA

Business & Tort Litigation Associate, October 2016—July 2018

- Litigated more than a dozen single-plaintiff cases arising under the Fair Credit Reporting Act; drafted pleadings, motions, discovery requests and responses, meet and confer letters, and co-defended a 30(b)(6) deposition
- Represented homeless residents living in Anaheim, California in a civil rights lawsuit; interviewed and prepared declarations for numerous witnesses, developed litigation strategy, drafted a civil rights complaint, and attended a confidential mediation conference as Jones Day's only representative

VOLUNTEERING/LANGUAGES

- Katy Young Yaroslavsky for Los Angeles City Council 2022 (C.D. 5)
Campaign Volunteer, January 2020—Present
- French (native fluency)

EXHIBIT
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